

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**AMBROSE MOSES III,**  
1900 Polaris Parkway, Suite 450-017  
Columbus, Ohio 43240

Plaintiff,

vs.

**CENTRAL STATE UNIVERSITY,**  
1400 Brush Row Road  
Wilberforce, Ohio 45384

and,

**BOARD OF TRUSTEES OF  
CENTRAL STATE UNIVERSITY,**  
1400 Brush Row Road  
Wilberforce, Ohio 45384

and,

**ALEX JOHNSON, INTERIM PRESIDENT  
CENTRAL STATE UNIVERSITY,**  
*Individually and in his official capacity,*  
1400 Brush Row Road  
Wilberforce, Ohio 45384

and,

**MORAKINYO KUTI, VICE-PRESIDENT  
AND DIRECTOR OF LAND-GRANT,  
CENTRAL STATE UNIVERSITY,**  
*Individually and in his official capacity,*  
1400 Brush Row Road  
Wilberforce, Ohio 45384

and,

**ALCINDA FOLCK, INTERIM ASSOCIATE  
ADMINISTRATOR OF EXTENSION and  
PROGRAM LEADER, AGRICULTURE  
AND NATURAL RESOURCES,  
CENTRAL STATE UNIVERSITY,**  
*Individually and in her official capacity,*  
1400 Brush Row Road  
Wilberforce, Ohio 45384

and,

**PAMELA BOWMAN, DIRECTOR OF  
HUMAN RESOURCES,  
CENTRAL STATE UNIVERSITY,**  
*Individually and in her official capacity,*  
1400 Brush Row Road

Case No.:

JUDGE:

**COMPLAINT  
FOR DECLARATORY AND  
INJUNCTIVE RELIEF AND DAMAGES**

1 Wilberforce, Ohio 45384

2 and,

3 **MARK RENDLEMAN, PROGRAM**  
4 **LEADER, COMMUNITY AND ECONOMIC**  
5 **DEVELOPMENT, CENTRAL STATE**  
6 **UNIVERSITY**

7 *Individually and in his official capacity,*  
8 1400 Brush Row Road  
9 Wilberforce, Ohio 45384

10 Defendants.

11 **COMPLAINT**  
12 **FOR DECLARATORY AND INJUNCTIVE RELIEF AND DAMAGES**

13 Plaintiff Ambrose Moses III, upon information and belief, and for his Complaint  
14 alleges as follows:

15 **INTRODUCTION**

- 16 1. This is a civil rights action brought by Plaintiff Ambrose Moses III, a  
17 licensed attorney and civil rights advocate, against Central State University and  
18 various university officials. Plaintiff alleges violations of his constitutional rights  
19 under the First and Fourteenth Amendments to the United States Constitution, as  
20 well as statutory rights under 42 U.S.C. § 1983. These violations include  
21 retaliatory actions, denial of substantive and procedural due process, and the  
22 maintenance of a hostile work environment. Shockingly, the defendants have  
23 continued and even escalated their retaliatory and obstructive conduct, even in  
24 the face of an ongoing investigation into Plaintiff's complaints, underscoring the  
25 depth of their disregard for Plaintiff's rights and the urgent need for judicial  
26 intervention.

27 **JURISDICTION AND VENUE**

- 28 2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331,  
as this case arises under the Constitution, laws, or treaties of the United States.

1           3.           This Court has authority to grant declaratory and injunctive relief pursuant  
2           to the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202. The Court has  
3           the authority to award costs and attorney's fees under 42 U.S.C. § 1988.

4           4.           This action includes federal questions under the First and Fourteenth  
5           Amendments to the Constitution of the United States and 42 U.S.C. § 1983.

6           5.           Venue is proper in this district pursuant to 28 U.S.C. § 1391 because a  
7           substantial part of the events or omissions giving rise to the claim occurred in this  
8           district, and the Defendants reside or are located in this district.

9  
10                                   **NATURE OF THE CASE**

11           6.           This case involves the Defendants' continuous and multifaceted violation  
12           of Plaintiff Ambrose Moses III's constitutional rights under the First and  
13           Fourteenth Amendments to the United States Constitution, as well as his  
14           statutory rights enforced via 42 U.S.C. § 1983. The violations include, but are not  
15           limited to, retaliatory actions, denial of substantive and procedural due process,  
16           and the creation and maintenance of a hostile work environment.

17  
18           7.           Plaintiff Ambrose Moses III, a licensed attorney and civil rights advocate,  
19           has been employed by Central State University since 2017 as the first County  
20           Extension Agent in the University's Cooperative Extension Service. Moses  
21           conducts CSU business in and resides in Delaware County, Ohio. Throughout  
22           his tenure, Plaintiff has consistently advocated for diversity, inclusion, and  
23           addressing systemic issues within the University's Cooperative Extension  
24           Service.

25           8.           Plaintiff's advocacy efforts, which are protected under the First  
26           Amendment, have included but are not limited to promoting intentionality in the  
27           recruitment of African Americans, advocating for a comprehensive needs  
28

assessment to identify and quantify the needs of underserved communities, and leveraging innovative technology to expand the reach and impact of Cooperative Extension Services.

9. In response to Plaintiff's protected speech and activities, Defendants have engaged in a pattern of retaliatory conduct designed to undermine Plaintiff's professional role, reduce his job responsibilities, and create a hostile work environment. This conduct includes arbitrary reductions in his job responsibilities, denial of necessary approvals for program activities, imposition of unlawful residency requirements, and issuance of a written reprimand based on false allegations.

10. Shockingly, Defendants have continued and even escalated their retaliatory and obstructive conduct, despite an ongoing investigation into Plaintiff's complaints. This brazen conduct underscores the depth of Defendants' disregard for Plaintiff's rights and the urgent need for judicial intervention to put an end to the ongoing violations.

11. Defendants' actions have not only impeded Plaintiff's ability to perform his duties effectively but have also violated his rights to substantive and procedural due process under the Fourteenth Amendment. These actions have been taken without fair notice, an opportunity to be heard, or adherence to the University's established policies and procedures.

12. The Defendants, acting under color of state law, have deprived Plaintiff of his constitutional rights, thus giving rise to claims under 42 U.S.C. § 1983. These actions reflect a deliberate indifference to Plaintiff's rights and a retaliatory motive to suppress his protected speech.

13. Plaintiff seeks declaratory and injunctive relief to rectify these ongoing violations, as well as compensatory and punitive damages to redress the harm caused by Defendants' unlawful conduct. Plaintiff also seeks costs and attorney's fees pursuant to 42 U.S.C. § 1988.

14. This case underscores the need for accountability and transparency within public institutions, particularly in ensuring that individuals who advocate for systemic change and diversity are protected from retaliation and unjust treatment. Defendants' actions have created a chilling effect on Plaintiff's and others' willingness to engage in protected speech, undermining the fundamental principles of free expression and equal protection under the law.

## THE PARTIES

### A. Plaintiff

15. Plaintiff Ambrose Moses III (also referred to herein as "Moses") is a licensed attorney and civil rights advocate. He is a United States citizen and resident of Delaware County, Ohio. Moses has been employed by Central State University since March 2017 as one of the first County Extension Agents in the University's Cooperative Extension Service. Moses is currently an Extension Educator in the Community and Economic Development program area of the Central State University Cooperative Extension Service. Moses conducts CSU business remotely from Delaware County, Ohio.

### B. Defendants

16. Defendant Central State University (hereinafter "CSU" or "University") is a state university, a public institution of higher learning, which is a body politic and corporate, and a subdivision of the state of Ohio. CSU's main campus is located at 1400 Brush Row Road, Wilberforce, Ohio 45384.

17. Defendant Board of Trustees of Central State University (hereinafter "Board of Trustees") is the governing body of CSU. The Board of Trustees is responsible for the proper maintenance and successful operation of the University, ensuring that it adheres to the laws of Ohio and the mandates for land-grant institutions. Ohio law requires that the Defendant Board of Trustees shall take, keep, and maintain exclusive authority, direction, supervision, and control over the operations and conduct of such university, so as to assure for said university the best attainable results with the aid secured to it from the state.<sup>1</sup> Ohio law further requires that the Board of Trustees of the Central State University shall elect, fix the compensation of, and have the right to remove the president, who shall be the chief executive officer of the university, and elect, fix the compensation of, and remove such number of professors, teachers, and other employees as is necessary.<sup>2</sup> The Board of Trustees' office is located at 1400 Brush Row Road, Wilberforce, Ohio 45384.

18. Defendant Alex Johnson (hereinafter "Johnson"), in his individual and official capacities, is the Interim President of Central State University. Johnson oversees the overall administration of the University, ensures that policies and procedures are followed, and addresses issues of compliance and governance. Johnson's office is located at 1400 Brush Row Road, Wilberforce, Ohio 45384.

19. Defendant Morakinyo Kuti (hereinafter "Kuti"), in his individual and official capacities, is the Vice President for Research and Economic Development and Director of 1890 Land-Grant Programs at Central State University. Kuti directs

---

<sup>1</sup> <https://codes.ohio.gov/ohio-revised-code/section-3343.05>

<sup>2</sup> <https://codes.ohio.gov/ohio-revised-code/section-3343.06>

1 the 1890 Land-Grant Programs, including the Cooperative Extension Service,  
2 and has a responsibility to ensure the program's compliance with federal and  
3 state regulations. On February 9, 2024, Kuti was named the 10th President of  
4 Central State University, a position he will assume on July 1, 2024. Kuti's office is  
5 located at 1400 Brush Row Road, Wilberforce, Ohio 45384.  
6

7 20. Defendant Alcinda Folck (hereinafter "Folck"), in her individual and official  
8 capacities, is the Interim Associate Administrator of Extension and the Program  
9 Leader for the Agriculture and Natural Resources ("ANR") program area at  
10 Central State University. Folck's office is located at 1400 Brush Row Road,  
11 Wilberforce, Ohio 45384.  
12

13 21. Defendant Pamela Bowman (hereinafter "Bowman"), in her individual and  
14 official capacities, is the Director of Human Resources at Central State  
15 University. Bowman's office is located at 1400 Brush Row Road, Wilberforce,  
16 Ohio 45384.  
17

18 22. Defendant Mark Rendleman (hereinafter "Rendleman"), in his individual  
19 and official capacities, is the Program Leader for the Community and Economic  
20 Development ("CED") program area at Central State University. Rendleman  
21 resides in Franklin County, Ohio.  
22

### 23 **HISTORICAL CONTEXT AND BACKGROUND**

24 23. On January 29, 2014, Defendant Central State University, a public  
25 historically Black university (HBCU) located in Wilberforce, Ohio, was finally  
26 designated as America's newest 1890 land-grant university. This designation  
27 underpins the university's mission to serve historically underserved communities,  
28 particularly African Americans, and reflects the broader commitment to diversity,  
inclusion, and educational equity.





1 to perform his job duties. The email, attached as Exhibit 1, provides a clear and  
2 well-documented example of the obstructive and retaliatory conduct Moses has  
3 faced, particularly from Defendant Mark Rendleman, the CED Program Leader.  
4 (See Exhibit 1)

5 28. In the email, Moses describes how Rendleman's requirement for direct  
6 written approval before engaging in any "outreach", "outreach efforts", or "CED  
7 activity" has created a bottleneck that prevents Moses from effectively doing his  
8 job. This is despite the Director's previous guidance to "do all the options that you  
9 need to do" to fulfill job duties. The email also includes a detailed timeline of  
10 communications between Moses and Rendleman regarding the Growing Equity  
11 Partnership Grant, highlighting Moses' diligent efforts to implement the project  
12 and the roadblocks put in place by Rendleman, most notably Rendleman's  
13 withholding of direct written approval.

14 29. Shockingly, the obstructive and retaliatory conduct detailed in this email  
15 has continued unabated, even as the University has initiated an investigation into  
16 Plaintiff Moses' complaints. Despite the ongoing investigation, Defendants Kuti,  
17 Folck, Bowman, and Rendleman have engaged in concerted activity to further  
18 impede Moses' ability to perform his job duties and carry out the mission of the  
19 Cooperative Extension Service.

20 30. Examples of the ongoing retaliatory and obstructive conduct that has  
21 occurred since the investigation began include:

- 22 1. Defendant Rendleman's continued refusal to approve Moses'  
23 outreach and CED activities, effectively blocking his ability to engage with  
24 the community and fulfill his job duties.
- 25 2. Coordinated efforts by Defendants Kuti, Folck, Bowman, and  
26 Rendleman to isolate, marginalize, and penalize Moses, creating a hostile  
27 work environment that undermines his professional standing and ability to  
28 be effective in his role.
3. Defendants' unilateral decision to refer Plaintiff's complaints that  
were submitted to the University pursuant to University policies to the

external investigator without the procedural processing, appeals, timeline, and public records transparency that would be afforded via the University policies and applicable state law, which also raises concerns about the integrity of the investigative process and the defendants' commitment to addressing the issues raised by Moses.

31. The fact that the defendants have continued and even escalated their retaliatory and obstructive conduct in the face of an ongoing investigation underscores the depth of their disregard for Plaintiff Moses' rights and the mission of the Cooperative Extension Service. This brazen conduct also demonstrates the need for immediate judicial intervention to put an end to the defendants' unlawful practices and ensure that Moses can perform his job duties without further interference or retaliation.

#### **A. Background of Plaintiff and Central State University**

32. Plaintiff Ambrose Moses III, a licensed attorney and civil rights advocate, has been employed by Central State University since 2017 when he accepted a position as the 1890 land-grant university's first County Extension Agent within its Cooperative Extension Service. In this role, Moses has been responsible for developing and implementing educational programs, fostering community partnerships, and providing resources to underserved communities in Ohio. His dedication and innovative approach have been instrumental in expanding the reach and impact of CSU's Cooperative Extension Service.

33. Throughout his tenure, Plaintiff has consistently advocated for the principles of diversity, inclusion, and addressing systemic issues within the University's Cooperative Extension Service, aligning his efforts with the historical mission of the land-grant system. His advocacy efforts, which are protected under the First Amendment, have been multi-faceted and impactful. Moses has tirelessly promoted intentionality in the recruitment of African Americans into the Cooperative Extension Service as a career. He has advocated for a

comprehensive needs assessment to identify and quantify the needs of underserved communities, including African American communities across Ohio. Additionally, he has advocated for leveraging innovative technology, such as blockchain and artificial intelligence (AI), to expand the reach and impact of Cooperative Extension Services.

34. Plaintiff's advocacy efforts are directly tied to the foundational principles of the land-grant system, emphasizing the importance of providing practical education and resources to historically underserved communities. The disparate impact of the COVID-19 pandemic on African Americans, the public outcry against systemic racism in America, and the subsequent societal shifts concerning legal, social, and economic justice have underscored the critical importance of Moses' work. His protected speech and activities are integral to fulfilling the land-grant mission and addressing the systemic inequities that the Morrill Acts and subsequent legislation aimed to correct.

35. Tragically, the Defendants have engaged in a pattern of retaliatory actions against Plaintiff, undermining the very mission he seeks to uphold. By targeting Moses for his advocacy efforts, the Defendants have not only violated his constitutional and statutory rights but have also undermined the core principles of the land-grant system. These actions highlight the urgent need for accountability and systemic change within the University's Cooperative Extension Service.

36. The Defendants, acting both individually and in concert, have violated Plaintiff's rights as guaranteed by the First Amendment and Fourteenth Amendment to the Constitution of the United States, as well as his statutory rights enforced via 42 U.S.C. § 1983. These violations include, but are not limited to, retaliatory actions, denial of substantive and procedural due process, and maintaining a hostile work environment. The Defendants' actions have not only caused significant harm to Plaintiff but have also had a chilling effect on others who may wish to advocate for change and equity within the institution.

37. This case seeks to hold the Defendants accountable for their unlawful actions and to secure justice for Plaintiff Moses. By doing so, this lawsuit aims to

1 vindicate the rights of those who speak out against systemic inequities and to  
2 promote the fundamental principles of diversity, inclusion, and equal protection  
3 under the law. The success of this case is not only critical for Plaintiff but also for  
4 the future of the land-grant system and its mission to serve all communities,  
5 regardless of race or socioeconomic status.

6  
7 **B. Plaintiff's Advocacy and Protected Activities**

8 38. Throughout his tenure at Central State University, Plaintiff Ambrose  
9 Moses III has consistently communicated his personal and professional mission  
10 of "Legal, Social, and Economic Justice For All People" to Defendants, including  
11 the Director of Land-Grant, Associate Administrator of Extension, and the CED  
12 Program Leader. Plaintiff's advocacy and protected activities, which are central to  
13 this Complaint, demonstrate his unwavering commitment to promoting diversity,  
14 inclusion, and equity within the University's Cooperative Extension Service.

15  
16 39. A key aspect of Plaintiff's advocacy and protected activities is leveraging  
17 his position as a public employee to identify systemic issues, develop practical  
18 solutions, and influence governmental actions to implement these solutions. By  
19 doing so, Moses seeks to fulfill his mission of ensuring life, liberty, and the pursuit  
20 of happiness for all citizens, particularly those from underserved communities.

21  
22 40. On November 27, 2019, Plaintiff submitted an R.C. § 124.341  
23 whistleblower report to Defendants, alerting them to noncompliance with state  
24 and federal law. Specifically, Plaintiff reported that the Defendants were imposing  
25 an unlawful residency requirement as part of the minimum qualifications for the  
26 newly created Regional Extension Associate positions. (See Exhibit 2)

27  
28 41. Plaintiff cited Ohio law, which prohibits the imposition of residency  
requirements on higher education employees (R.C. § 124.70) and certain other

1 employees (R.C. § 9.481). He also referenced the Ohio Supreme Court's  
2 decision in Lima v. State, 2009-Ohio-2597, which held that a state law prohibiting  
3 general residency requirements for public employees is valid and supersedes  
4 local laws to the contrary. (See Exhibit 2)

5 42. In his report, Plaintiff argued that Defendants' imposition of unlawful  
6 residency requirements on higher education employees could disproportionately  
7 exclude Black American applicants, violating state and federal civil rights laws.  
8 He cited data from the Ohio Development Services Agency, which states that  
9 "nearly four out of every ten African Americans in the state live in the cities of  
10 Cincinnati, Cleveland, or Columbus." (See Exhibit 2)

11 43. On August 19, 2020, Plaintiff sent an email to CED Program Leader  
12 Anthony Barwick advocating for greater inclusion of Black Americans in the CSU  
13 Cooperative Extension Service. He highlighted Ohio's historical and present  
14 systemic racism, referencing declarations of racism as a public health crisis by  
15 multiple Ohio cities and counties, as well as a statement by Governor Mike  
16 DeWine. Moses emphasized the lack of Black representation in Extension  
17 services across Ohio and the unique opportunity presented by CSU Extension's  
18 expansion to address this disparity. He argued for the inclusion of Black Ohioans  
19 in Extension, given the growing number of Black individuals entering agriculture  
20 and the USDA's new urban agriculture initiatives.

21 44. On November 4, 2021, Plaintiff sent an email to his direct supervisor, CED  
22 Program Leader Anthony Barwick, reporting that the "approved" Requests for  
23 Travel (RFTs) he had received back from University leadership had been altered,  
24 with his signature forged onto the documents. Moses further reported that similar  
25 incidents had occurred with other CED Educators and requested Barwick to  
26  
27  
28

1 review the attached information and documents showing the inaccurate,  
2 improper, and potentially unlawful actions concerning the approved RFTs.

3 45. On November 8, 2021, Barwick reported the matter up the chain of  
4 command to the Defendant Associate Administrator of Extension. At Moses's  
5 request, Barwick also escalated the issue to the Defendant Director of Land-  
6 Grant Programs. Based on information and belief, Moses understands that the  
7 alterations and forged signatures were executed by or at the direction of the  
8 Defendant Associate Administrator of Extension.  
9

10 46. On November 23, 2022, Plaintiff submitted another R.C. § 124.341  
11 whistleblower report to Defendants, this time concerning the University's failure to  
12 comply with state and federal laws regarding employment discrimination and  
13 retaliation.  
14

15 47. On December 1, 2022, Plaintiff submitted a request to the Central State  
16 University Board of Trustees, President, and Provost for an independent  
17 investigation into a pattern of unlawful employment practices and retaliation. In  
18 his request, Moses detailed ongoing discriminatory practices, including his own  
19 experiences of retaliation and racially discriminatory treatment. He highlighted  
20 the University's failure to address previous reports he filed under R.C. § 124.341  
21 and emphasized the urgent need for transparency and corrective actions. Moses  
22 specifically requested the suspension of scheduled interviews for the CED  
23 Program Leader position pending the investigation and called attention to the  
24 University's systemic issues, lack of diversity, and failure to uphold its mission as  
25 an 1890 Land-Grant Institution. Plaintiff subsequently sought to engage with  
26 Defendant Kuti to address the matter internally without taking matters further  
27 towards litigation. (See Exhibit 4)  
28

1 48. Throughout his tenure, Plaintiff has consistently advocated for  
2 intentionality, diversity, and inclusion in the recruitment of African Americans to  
3 the Cooperative Extension Service.

4 49. Plaintiff has actively advocated for a comprehensive needs assessment to  
5 identify and quantify the needs of underserved communities in Ohio, particularly  
6 African Americans, which the CSU Cooperative Extension Service can address.

7 50. Recognizing the potential of technology to expand the reach and impact of  
8 Cooperative Extension Services, Plaintiff has promoted the utilization and  
9 leveraging of innovative tools such as blockchain solutions and online  
10 communication platforms (Zoom, Microsoft Teams) to better serve underserved  
11 residents of Ohio via hybrid (i.e. simultaneously in-person and online)  
12 Cooperative Extension Service program activities.

13 51. In line with administrative and legislative declarations by several Ohio  
14 cities and counties, Plaintiff has advocated for CSU's Cooperative Extension  
15 Service to engage in efforts and utilize policy, systems, and environmental (PSE)  
16 methodologies to address racism as a public health crisis.

17 52. During the COVID-19 pandemic, Plaintiff's role was elevated from a  
18 County Extension Educator to a Statewide Extension Educator. In this new role,  
19 Plaintiff's early observation and research highlighted the disparate impact of the  
20 pandemic on the Black community and Black-owned businesses. In response,  
21 he developed a program called PRiMR: Disaster Management Education to  
22 address these disparities and provide much-needed support to affected  
23 communities.

24 53. Plaintiff has consistently raised concerns about Defendants' failure to  
25 follow University policies and procedures, especially concerning the processing  
26  
27  
28

1 of formal complaints and job description changes. His adherence to proper  
2 protocols and insistence on transparency and accountability demonstrate his  
3 commitment to ensuring fair and equitable practices within the University.

4 54. Through these and other advocacy efforts, Plaintiff Moses has  
5 demonstrated an unwavering dedication to promoting diversity, inclusion, and  
6 equity within Central State University's Cooperative Extension Service. His  
7 protected activities, aimed at addressing systemic issues and upholding the  
8 mission of the 1890 Land-Grant Institution, are central to this Complaint and the  
9 broader fight for justice and equal opportunity.  
10

### 11 **C. Defendants' Retaliatory Actions**

12 55. In response to Plaintiff's protected speech and activities, Defendants have  
13 engaged in a continuous and multifaceted campaign of retaliation designed to  
14 undermine Plaintiff's professional standing, hinder his ability to perform his job  
15 duties effectively, and create a hostile work environment. The following examples  
16 illustrate the depth and breadth of the Defendants' retaliatory actions:  
17

- 18 1. In 2018, Defendant Director of Land-Grant, through Defendant CED  
19 Program Leader, imposed an unlawful residency requirement on Plaintiff  
20 in violation of O.R.C. § 9.481 and O.R.C. § 124.70, which prohibit such  
21 requirements for higher education employees. Although Plaintiff resisted  
22 this action and the Defendants appeared to drop the issue, Defendant  
23 Mark Rendleman, in his individual capacity and his official capacity as  
24 CED Program Leader, subsequently began applying and imposing a  
25 residency requirement on Plaintiff's work activities without Plaintiff's  
26 knowledge until recent disclosures pursuant to a public records request.  
27  
28



1           2.           On November 7, 2019, Plaintiff Ambrose Moses III, an African  
2           American, applied for all four newly created Regional Extension Associate  
3           (REA) positions for which he was qualified. Despite his qualifications,  
4           Moses was not selected for any of these positions. Moses contends that  
5           the Defendant Director of Land-Grant harbored resentment towards him  
6           for his prior protected activities concerning, but not limited to, the unlawful  
7           residency requirements the Defendants sought to impose on the REA  
8           positions and upon Moses. This lead to Defendants' decision to not hire  
9           or promote Moses in retaliation for his exercise of First Amendment rights.  
10          The Defendants' decision to hire exclusively Caucasian candidates for all  
11          four REA positions, and their failure to hire Moses for either of the two  
12          CED Extension Educator positions he applied for on March 9, 2020, and  
13          April 7, 2020, also constitutes unequal and discriminatory treatment based  
14          on race and national origin, violating the Equal Protection Clause of the  
15          Fourteenth Amendment.  
16

17  
18  
19          3.           Defendants engaged in a concerted and coordinated effort to strip  
20          away Plaintiff's Statewide Extension Educator status and demote him to a  
21          Regional Extension Educator, effectively reducing his job responsibilities  
22          and professional standing. This action was taken in retaliation for Plaintiff's  
23          protected speech and activities.  
24

25          4.           In a clear attempt to undermine Plaintiff's advocacy efforts and  
26          professional goals, Defendants removed the service to underserved  
27          populations, particularly Black communities, as a critical component of  
28          Plaintiff's job description.

1           5. Defendants deliberately impeded Plaintiff's professional growth by  
2 failing to approve his travel and participation in various professional  
3 development opportunities, such as the HBCU Blockchain Conference  
4 and disaster management training sessions.

5           6. Defendants imposed an arbitrary and restrictive requirement that  
6 Plaintiff obtain prior written approval from Defendant Rendleman before  
7 conducting any CED Activities and Outreach Efforts. This approval was  
8 rarely granted, effectively stifling Plaintiff's ability to perform his job duties  
9 and engage with the community.  
10

11           7. The State Personnel Board of Review (SPBR) recently found that  
12 Defendants Central State University and Morakinyo Kuti engaged in  
13 retaliatory actions against another employee, Dr. Subramania Sritharan  
14 (Dr. Sri), following his protected whistleblower activities. Dr. Sri had  
15 reported concerns about the improper use of USDA-NIFA grant funds to  
16 pay Dr. Kuti's salary, which could potentially violate federal regulations. In  
17 response to his whistleblower report, Dr. Kuti, who later became Dr. Sri's  
18 supervisor, issued non-renewal notices based on false assertions without  
19 proper consultation or justification. The SPBR determined that these non-  
20 renewals were retaliatory and that Dr. Sri's subsequent resignation was a  
21 constructive dismissal induced by CSU's false information. Notably,  
22 Human Resources Director Pamela Bowman failed to conduct a proper  
23 review of Dr. Sri's personnel file, which would have confirmed his faculty  
24 status, and instead facilitated the retaliatory actions by supporting the non-  
25 renewal decisions. The SPBR ordered CSU to restore Dr. Sri to his  
26 administrative position with all associated rights and benefits. This finding  
27  
28

underscores a pattern of retaliation and denial of due process within CSU, highlighting similar retaliatory actions faced by Plaintiff Ambrose Moses III for his protected activities. (See Exhibit 5)

8. During the SPBR proceedings, Defendant Bowman testified that if "a Dean" like Dr. Kuti requested a letter of non-renewal, she would type it up without further research or consultation. This statement demonstrates Bowman's willingness to prioritize directives from university deans and high-ranking officials over adherence to established policies and procedures designed to protect employees' rights. By failing to conduct proper reviews and blindly following the instructions of deans, Bowman facilitated the retaliatory actions against Dr. Sri and enabled the abuse of power within CSU. This attitude exemplifies the broader issues of retaliation and denial of due process within the university, which are central to Plaintiff Moses' claims. The defendants' concerted and coordinated efforts leading up to the issuance of a written reprimand to Plaintiff on February 8, 2024, mirror the same pattern of misconduct and disregard for proper procedures evident in Dr. Sri's case. Bowman's testimony underscores the systemic nature of these issues and the need for accountability to prevent further violations of employees' rights.

9. On January 3, 2024, Plaintiff wrote an email to Defendant Rendleman, stating "Good morning Mark. Since this will be our first CED Team meeting of the new year, could you start us off by explaining the plan for 2024? Maybe you could walk us through the CED portion of the attached Extension Programs Plan of Work for FY 2024 that Dr. Folck

posted to Teams. It will be helpful for the CED Team to know and to discuss—

- the identified needs that CED will be addressing in 2024,
- what specific CED programs will be implemented and conducted in 2024,
- what impact we expect to have with the CED programs,
- how we will measure the impact of the CED programs in 2024, and
- how all of this executes and accomplishes the Extension Programs Plan of Work for FY 2024.

10. On January 9, 2024, Defendant Rendleman sent an email to Defendant Folck regarding Plaintiff Moses' email dated January 3, 2024 and protected activities, stating, "It is definitely time to circle the wagons." This statement, made in response to Moses' email, reveals the Defendants' intent to coordinate a retaliatory response against Plaintiff for engaging in protected speech and advocacy. The phrase "circle the wagons" implies a defensive and adversarial posture, suggesting that the defendants viewed Plaintiff's actions as a threat to be countered rather than legitimate concerns to be addressed. This email exchange demonstrates the defendants' retaliatory motive and their concerted efforts to target Plaintiff Moses for his protected activities, further contributing to the hostile work environment and pattern of retaliation he faced. The fact that high-level officials like Rendleman and Folck were involved in discussing and coordinating this response underscores the pervasive and systemic nature of the retaliation within CSU.

11. On January 22, 2024, Defendant Rendleman sent an email to Defendant Folck, revealing their plan to coordinate retaliatory actions against Plaintiff Moses and another employee named Amber Twitty. In the

1 email, Rendleman wrote, "... Now back to my wish list: ... Let's coordinate  
2 on our reprimand strategies for Ambrose and Amber. I will also be  
3 coordinating a meeting with HR, Dr. Knight. It would be nice if you could  
4 participate in these discussions."

5 12. Rendleman's email dated January 22, 2024, exposes the  
6 Defendants' explicit intent to target Plaintiff Moses and another employee  
7 with reprimands, demonstrating a premeditated and coordinated effort to  
8 retaliate against them. By referring to the reprimands as part of a "wish  
9 list," Rendleman reveals a personal desire to punish Plaintiff and Amber,  
10 rather than addressing legitimate performance concerns. Furthermore,  
11 Rendleman's invitation for Folck to participate in discussions with Human  
12 Resources and Dr. Knight indicates an effort to involve multiple high-level  
13 university officials in the retaliatory scheme.

14 13. Rendleman's email dated January 22, 2024 provides further direct  
15 evidence of the Defendants' retaliatory motive and their concerted efforts  
16 to take adverse actions against Plaintiff Moses. It also shows how the  
17 Defendants actively collaborated to devise strategies for issuing  
18 reprimands, creating a hostile and discriminatory work environment. The  
19 email supports the allegations in this Complaint of a pattern of retaliation  
20 and highlights the Defendants' abuse of their positions to target and  
21 punish employees who engage in protected activities or advocacy efforts.

22 14. On February 5, 2024, just three days before issuing the written  
23 reprimand to Plaintiff, Defendant Rendleman sent an email to Defendant  
24 Bowman, stating, "Mrs. Bowman, I have attached the latest final draft of  
25 my letter to Ambrose Moses III. It has been reviewed by Dr. Kuti and Dr.  
26  
27  
28

1 Folck. It is at their request that I forward it to your attention. Please review  
2 and comment." This email demonstrates the coordinated efforts of  
3 Defendants Rendleman, Kuti, Folck, and Bowman in preparing and  
4 finalizing the retaliatory written reprimand against Plaintiff. The  
5 involvement of multiple defendants in reviewing and approving the  
6 reprimand underscores the concerted nature of their actions and the high-  
7 level decision to take adverse action against Plaintiff in response to his  
8 protected activities. This email further evidences the ongoing pattern of  
9 retaliatory conduct and the defendants' joint efforts to target and punish  
10 Plaintiff for his advocacy and whistleblowing.  
11  
12

13 15. On February 29, 2024, Defendant Folck forwarded an email to  
14 Defendant Rendleman concerning a project titled "Programming in  
15 Columbus," stating, "FYI. This is a project that Marc Amante and Ambrose  
16 have been working on since 2022." This email highlights Plaintiff's ongoing  
17 professional activities and collaborative efforts to serve the community.  
18 However, in response, Defendant Rendleman replied to Folck that same  
19 day, "Thanks for sharing! What is important to me is the fact that all  
20 activities require advance approval. Nothing is grandfathered. I will review  
21 the stack of Ambrose emails to verify that there has been a request for  
22 advance approval."  
23  
24

25 16. Rendleman's response to Folck's email on February 29, 2024  
26 demonstrates a targeted and retaliatory approach to scrutinizing Plaintiff's  
27 work, even for projects that had been ongoing since 2022. By  
28 emphasizing that "nothing is grandfathered" and expressing his intent to  
"review the stack of Ambrose emails," Rendleman singles out Plaintiff and

1 subjects him to heightened scrutiny and approval requirements not applied  
2 to other employees. This exchange further evidences the defendants'  
3 concerted efforts to create obstacles for Plaintiff and restrict his ability to  
4 perform his job duties, in retaliation for his protected activities and  
5 advocacy efforts. The email chain also shows how the defendants actively  
6 shared information about Plaintiff's work and collaborated to implement  
7 retaliatory measures, creating a hostile and discriminatory work  
8 environment.  
9

10 17. Defendants consistently created a hostile work environment for  
11 Plaintiff by marginalizing him, excluding him from important discussions,  
12 and characterizing his legitimate professional activities as disruptive. This  
13 ongoing conduct was designed to punish Plaintiff for his advocacy efforts  
14 and chill his protected speech.  
15

16 18. In a clear act of retaliation, Defendant Rendleman unilaterally  
17 canceled nearly all one-on-one meetings with Plaintiff between February  
18 2, 2024, and the filing of this Complaint, denying him critical opportunities  
19 to address important issues and perform his job duties effectively,  
20 including but not limited to the Greater Equity Partnership Grant.  
21

22 19. Defendant Rendleman further retaliated against Plaintiff by denying  
23 his CED Extension Educator Individual Plans of Work for both 2023 and  
24 2024, effectively blocking Plaintiff's ability to carry out his professional  
25 responsibilities and advocate for the needs of underserved communities.  
26

27 20. On or about July 19, 2023, Defendant Rendleman denied Plaintiff's  
28 advocacy and Proposal for a Pilot Project Utilizing the PSE Approach to  
Needs Assessment and Program Development, another clear example of

1 retaliation designed to impede his advocacy efforts and professional  
2 growth.

3 21. Defendants failed to approve Plaintiff's request to attend disaster  
4 management training at the National Incident Management System  
5 Agrosecurity Whole Community Resilience Incident Command System  
6 workshop scheduled for May 23-25, 2023 in Montgomery, Alabama,  
7 despite the fact that lodging would have been provided by the Extension  
8 Disaster Education Network (EDEN). This denial was retaliatory and an  
9 adverse action against Plaintiff for engagement in protected activities.  
10

11 22. Similarly, Defendants failed to approve Plaintiff's request to attend  
12 disaster management training at the 1890 SARE Project Bootcamp in  
13 Atlanta, Georgia, on February 7-9, 2024, even though all costs (travel,  
14 lodging, food, registration) would have been covered by the 1890 EDEN  
15 Advisory Group. This rejection was another instance of retaliation against  
16 Plaintiff.  
17

18 23. Defendants denied Plaintiff's request, as Central State University's  
19 Delegate to EDEN and a member of the 1890 EDEN Advisory Group, to  
20 attend the 1890 EDEN Face-to-Face Meeting at North Carolina A&T on  
21 June 4-6, 2024, despite the fact that all costs would have been paid by the  
22 1890 EDEN Advisory Group. This denial was a clear attempt to prevent  
23 Plaintiff from engaging in important professional activities and advocating  
24 for the needs of underserved communities.  
25

26 24. Defendants failed to approve Plaintiff's Request for Approval to  
27 conduct outreach and cooperative extension services with OEFFA and  
28



1 their Farmer Helpshops on May 20, 2024, and August 19, 2024, further  
2 hindering his ability to perform his job duties and serve the community.

3 25. On or about December 2, 2021, CED Program Leader Barwick  
4 announced his resignation and recommended to the Associate  
5 Administrator of Extension that Plaintiff Ambrose Moses III be named  
6 Interim CED Program Leader. Despite Barwick's recommendation, which  
7 highlighted Moses' qualifications and seniority within CSU Extension, the  
8 Dean and Director of Land-Grant Programs did not appoint Moses or  
9 anyone else to the interim position, leaving the position vacant for nearly a  
10 year. The Defendants' failure to appoint Moses as Interim CED Program  
11 Leader, despite his qualifications and Barwick's recommendation, was a  
12 clear act of retaliation against him for his protected activities.  
13  
14

15 56. The aforementioned actions are just a sample of the continuous and  
16 multifaceted retaliation Plaintiff has faced for his protected speech and activities.  
17 As additional evidence is uncovered, the full extent of Defendants' retaliatory  
18 conduct will come to light, further demonstrating the severity and pervasiveness  
19 of their actions.  
20

#### 21 **D. Defendants' Denial of Due Process**

22 57. In addition to the retaliatory actions outlined above, Defendants have  
23 consistently denied Plaintiff his right to due process, as guaranteed by the  
24 Fourteenth Amendment to the United States Constitution. The following  
25 examples illustrate the Defendants' pattern of disregarding established University  
26 policies and procedures, thereby depriving Plaintiff of fair notice, an opportunity  
27 to be heard, and impartial consideration of his grievances.  
28

1. Defendants arbitrarily reduced Plaintiff's job responsibilities and demoted his position without providing fair notice, an opportunity to be heard, or adhering to the University's established policies and procedures. This denial of due process not only violated Plaintiff's constitutional rights but also undermined his ability to perform his job duties effectively and advocate for the needs of underserved communities.

2. Central State University's Policy No. 618 mandates that the job performance of all staff members of non-bargaining units be evaluated formally by their supervisor at least annually. In 2022, Defendants failed to appoint an interim CED Program Leader, leaving Plaintiff Ambrose Moses III, a CED Extension Educator, without a proper supervisor to conduct his performance appraisal as required by Policy No. 618. Instead, the Associate Administrator of Extension, whom Moses had previously reported for forgery, conducted his performance appraisal. The Associate Administrator retaliated against Moses by not following the mandated performance appraisal process and giving Moses an unfair, untrue, and low score. Despite Moses' objections to this violation of University policy, communicated via email on May 13, 2022, to the Dean/Director of Land-Grant, Associate Administrator of Extension, and Director of Human Resources, Defendant Bowman has failed to respond to Moses' concerns, further denying him due process.

3. Defendants removed key aspects of Plaintiff's job description, including his role in the EDEN Advisory Group, without proper justification or due process. This unilateral action negatively impacted Plaintiff's

1 professional duties and contributions, and denied him the opportunity to  
2 contest the changes through established University channels.

3 4. Defendants consistently failed to process Plaintiff's formal  
4 complaints and grievances according to University policies. Instead, they  
5 would either ignore and take no action or, as in recent weeks, Defendants  
6 have unilaterally referred Plaintiff's complaints to an external investigator  
7 who has an attorney-client relationship with the University.  
8

9 5. Defendants' referral of Plaintiff's complaints to an external  
10 investigator, with whom one or more of the Defendants has an attorney-  
11 client relationship, has, and continues to, deny Plaintiff due process and  
12 equal protection afforded by the Fourteenth Amendment and 42 U.S.C. §  
13 1983, including but not limited to, the uniform procedural processing,  
14 appeals, timelines, and public records transparency that would be afforded  
15 via the University policies and applicable state law. This also raises  
16 concerns about the integrity, fairness, and impartiality of the investigative  
17 process and the Defendants' commitment to addressing the issues raised  
18 by Moses as he petitions the government for a redress of his grievances.  
19

20 6. On April 16, 2024, Plaintiff Ambrose Moses III submitted a formal  
21 complaint to Central State University leadership, including Defendants  
22 Alex Johnson, Morakinyo Kuti, and Pamela Bowman, alleging copyright  
23 infringement, false attribution, plagiarism, academic dishonesty,  
24 retaliation, and hostile work environment by Defendant Mark Rendleman,  
25 the CED Program Leader. Moses detailed violations of the University's  
26 Professional Code of Conduct, Intellectual Property Policy, and federal  
27 copyright laws, asserting that his educational materials were used without  
28

1 authorization and falsely attributed to others. Despite the serious nature of  
2 these allegations, the University failed to process Moses' complaint  
3 through its Human Resources department, Intellectual Property  
4 Committee, or any internal mechanism, instead referring the matter to an  
5 external investigator with an attorney-client relationship with the  
6 University. This handling of the complaint exemplifies the ongoing denial  
7 of due process and the retaliatory actions Moses has faced. (See Exhibit  
8 3)  
9

10 7. On April 17, 2024, Plaintiff Ambrose Moses III submitted a formal  
11 complaint to Central State University's Director of Human Resources,  
12 Pamela Bowman, detailing ongoing violations of the University's  
13 Professional Code of Conduct, University Policy No. 8, University Policy  
14 607, and University Policy 607.1. The complaint, which followed a  
15 previous report on November 28, 2023, addressed persistent wrongful and  
16 unlawful treatment, including a "quiet firing" campaign and violations of  
17 state and federal laws. Despite the University's policies requiring internal  
18 processing of such complaints, Moses' grievances were unilaterally  
19 referred to an external investigator who has an attorney-client relationship  
20 with the University, thereby denying him timely, fair, and impartial  
21 consideration of his claims in accordance with established University  
22 procedures.  
23  
24  
25

26 58. The Defendants' consistent denial of due process to Plaintiff Moses, as  
27 evidenced by the examples above, demonstrates a clear pattern of disregard for  
28 his constitutional rights and a failure to adhere to the University's own policies  
and procedures. These actions have not only caused significant harm to

1 Plaintiff's professional standing and ability to perform his job duties but have also  
2 created a chilling effect on his protected speech and advocacy efforts.

3 59. By referring Plaintiff's complaints and grievances to an external  
4 investigator with an attorney-client relationship with the University, Defendants  
5 have effectively denied him access to the impartial complaint resolution  
6 mechanisms guaranteed by University policy and the Fourteenth Amendment.  
7 This denial of due process has compounded the retaliatory nature of Defendants'  
8 actions and further underscores the need for judicial intervention to protect  
9 Plaintiff's rights.  
10  
11  
12  
13  
14  
15

## 16 CAUSES OF ACTION

### 17 COUNT I: 18 VIOLATION OF FIRST AMENDMENT RIGHTS 19 UNDER 42 U.S.C. § 1983 20 RETALIATION FOR PROTECTED SPEECH AND ACTIVITIES

21 60. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

22 61. Plaintiff Ambrose Moses III engaged in constitutionally protected speech  
23 and activities, including but not limited to: a. Advocating for diversity, inclusion,  
24 and addressing systemic issues within Central State University's Cooperative  
25 Extension Service; b. Promoting intentionality in the recruitment of African  
26 Americans into the Cooperative Extension Service; c. Advocating for a  
27 comprehensive needs assessment to identify and quantify the needs of  
28 underserved communities, particularly African American communities across  
Ohio; d. Leveraging innovative technology to expand the reach and impact of

1 Cooperative Extension Services; e. Reporting noncompliance with state and  
2 federal laws, including whistleblower reports filed under R.C. § 124.341.

3 62. Plaintiff's protected First Amendment speech and activities addressed  
4 matters of public concern, including but not limited to, the effective functioning of  
5 the University's Cooperative Extension Service, the fulfillment of its mission as an  
6 1890 Land-Grant Institution (including but not limited to the completion of proper  
7 needs assessments), compliance with state and federal laws, and addressing  
8 racism as a public health crisis.  
9

10 63. In response to Plaintiff's protected speech and activities, Defendants,  
11 acting under color of state law, took adverse actions against Plaintiff, including  
12 but not limited to: a. Reducing Plaintiff's job responsibilities and demoting his  
13 position; b. Imposing unlawful residency requirements on Plaintiff; c. Issuing a  
14 written reprimand to Plaintiff based on false allegations of insubordination; d.  
15 Creating and maintaining a hostile work environment that marginalized Plaintiff,  
16 excluded him from important discussions, and characterized his legitimate  
17 professional activities as disruptive.  
18  
19

20 64. Defendants' adverse actions were substantially motivated by Plaintiff's  
21 protected speech and activities, as evidenced by the temporal proximity between  
22 Plaintiff's advocacy efforts and the retaliatory conduct, as well as the pattern of  
23 targeting Plaintiff for his protected expression.  
24

25 65. By retaliating against Plaintiff for his protected speech and activities,  
26 Defendants violated Plaintiff's rights under the First Amendment to the United  
27 States Constitution, as applied to the states through the Fourteenth Amendment.  
28

1       66. Defendants' retaliatory actions have caused and continue to cause  
2       significant harm to Plaintiff, including emotional distress, humiliation, loss of  
3       professional reputation, and other damages.

4       67. As a direct and proximate result of Defendants' unconstitutional retaliation  
5       and actions, Plaintiff has suffered and continues to suffer irreparable injury,  
6       including but not limited to, emotional distress, humiliation, loss of professional  
7       reputation, and other damages for which there is no adequate remedy at law.

8       68. Plaintiff is entitled to declaratory relief, injunctive relief enjoining  
9       Defendants from further retaliatory actions, compensatory damages, punitive  
10      damages to deter future unconstitutional conduct, and attorneys' fees and costs  
11      pursuant to 42 U.S.C. § 1988.  
12

13  
14                                   **COUNT II:**  
15                                   **VIOLATION OF FOURTEENTH AMENDMENT**  
16                                   **DUE PROCESS RIGHTS UNDER 42 U.S.C. § 1983**  
17                                   **DENIAL OF PROCEDURAL AND SUBSTANTIVE DUE PROCESS**

18      69. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

19      70. Plaintiff Ambrose Moses III had a protected property interest in his  
20      continued employment with Central State University, as well as a protected  
21      liberty interest in his professional reputation and ability to pursue his chosen  
22      career.

23      71. Defendants, acting under color of state law, deprived Plaintiff of his  
24      protected property interests and liberty interests without due process of law, in  
25      violation of the Fourteenth Amendment to the United States Constitution.  
26      Specifically, but not limited to, Defendants: a) Reduced Plaintiff's job  
27      responsibilities and demoted him without providing fair notice, an opportunity to  
28      be heard, or following established University policies and procedures; b) Failed to

1 process Plaintiff's formal complaints and grievances according to University  
2 policies, instead unilaterally referring them to an external investigator with an  
3 attorney-client relationship with the University, denying Plaintiff access to a fair,  
4 transparent, and impartial investigation; c) Removed key aspects of Plaintiff's job  
5 description, including his role as an EDEN Delegate, a member of the EDEN  
6 Advisory Group, and serving communities historically underserved by Extension,  
7 without proper justification or due process, negatively impacting his professional  
8 duties and contributions; and d) Defendants Rendleman (Program Leader), Folck  
9 (Interim Associate Administrator of Extension), Bowman (Director of Human  
10 Resources), and Kuti (Director of Land-Grant and Vice President of Research  
11 and Economic Development) engaged in coordinated and concerted retaliatory,  
12 adverse, and hostile work environment actions that tainted the established  
13 policies and procedures for addressing employee complaints and grievances.  
14  
15

16 72. Defendants' actions were arbitrary, capricious, and not rationally related to  
17 any legitimate governmental interest, violating Plaintiff's right to substantive due  
18 process.  
19

20 73. As a direct and proximate result of Defendants' violation of Plaintiff's  
21 procedural and substantive due process rights, Plaintiff has suffered and  
22 continues to suffer emotional distress, humiliation, loss of professional reputation,  
23 and other damages.  
24

25 74. Plaintiff is entitled to declaratory relief, injunctive relief requiring  
26 Defendants to comply with due process requirements, compensatory damages,  
27 punitive damages to deter future constitutional violations, and attorneys' fees and  
28 costs pursuant to 42 U.S.C. § 1988.



**COUNT III:**  
**VIOLATION OF FIRST AND FOURTEENTH AMENDMENT RIGHTS**  
**UNDER 42 U.S.C. § 1983**  
**MAINTENANCE OF A HOSTILE WORK ENVIRONMENT**

75. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

76. Defendants, acting under color of state law, created and maintained a hostile work environment that violated Plaintiff's rights under the First and Fourteenth Amendments to the United States Constitution. Defendants' actions included, but were not limited to: a. Marginalizing Plaintiff and excluding him from important discussions related to his job duties and professional responsibilities; b. Characterizing Plaintiff's legitimate professional activities and protected speech as disruptive, disrespectful, or insubordinate; c. Subjecting Plaintiff to unwarranted disciplinary actions, such as the issuance of a written reprimand based on false allegations of insubordination; d. Repeatedly denying Plaintiff's requests to attend professional development opportunities and engage in community outreach activities.

77. Defendants' actions were sufficiently severe and pervasive to alter the terms and conditions of Plaintiff's employment and create an abusive working environment.

78. The hostile work environment created by Defendants was retaliatory in nature and designed to punish Plaintiff for his protected speech and activities, in violation of the First Amendment.

79. Defendants' maintenance of a hostile work environment also deprived Plaintiff of his protected property and liberty interests without due process of law, in violation of the Fourteenth Amendment.



1           2.           An order requiring Defendants to reinstate Plaintiff to his previous  
2                   position as a Statewide Extension Educator or an equivalent position, with  
3                   all associated rights, benefits, and privileges;

4           3.           An order requiring Defendants to remove any negative or retaliatory  
5                   materials from Plaintiff's personnel file, including the written reprimand  
6                   based on false allegations of insubordination;

7           4.           An order requiring Defendants to provide written notification to all  
8                   employees of Central State University's Cooperative Extension Service,  
9                   stating that Defendants' actions violated Plaintiff's constitutional rights and  
10                  affirming Plaintiff's right to engage in protected speech and activities  
11                  without fear of retaliation.  
12

13  
14       C. Compensatory Damages:

15           1.           An award of compensatory damages against Defendants in their  
16                   individual capacities, jointly and severally, in an amount to be determined  
17                   at trial, for the emotional distress, humiliation, loss of professional  
18                   reputation, loss of income, and other damages suffered by Plaintiff as a  
19                   result of Defendants' unconstitutional actions.  
20

21       D. Punitive Damages:

22           1.           An award of punitive damages against Defendants in their  
23                   individual capacities, jointly and severally, in an amount to be determined  
24                   at trial, to punish Defendants for their willful, malicious, and reckless  
25                   disregard for Plaintiff's constitutional rights and to deter similar misconduct  
26                   in the future.  
27  
28

E. Costs and Attorney's Fees:

1. An award of reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988, incurred in bringing this action to vindicate Plaintiff's constitutional rights.

F. Pre- and Post-Judgment Interest:

1. An award of pre-judgment and post-judgment interest on all monetary awards, to the fullest extent permitted by law.

G. Retention of Jurisdiction:

1. An order retaining jurisdiction over this matter to ensure Defendants' compliance with the Court's orders and to provide any additional relief that may be necessary and appropriate.

H. Any other relief the Court deems just, proper, and equitable.

Dated this 6<sup>TH</sup> day of June, 2024

**s/ Ambrose Moses III**

---

**Ambrose Moses III (0055231)**  
Attorney at Law  
1900 Polaris Parkway, Suite 450-017  
Columbus, Ohio 43240  
(614) 418-7898  
[info@MosesLaw.pro](mailto:info@MosesLaw.pro)

Plaintiff *Pro Se*

**JURY DEMAND**

Plaintiff Ambrose Moses III hereby demands a trial by jury on all issues so triable.

**s/ Ambrose Moses III**

---

**Ambrose Moses III (0055231)**